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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE CHRYSLER-DODGE-JEEP  
ECODIESEL MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION

Case No. 3:17-md-02777-EMC  
ORDER - PRETRIAL ORDER NO. 19

**AGREED STIPULATION AND  
[PROPOSED] ORDER AMENDING  
CERTAIN DEADLINES**

The Honorable Edward M. Chen

WHEREAS, on March 15, 2018, the Court granted in part and denied in part Defendants' motions to dismiss the Class Plaintiffs' Amended Consolidated Consumer Class Action Complaint, and granted leave to amend certain of their claims (ECF No. 290);

WHEREAS, the Class Plaintiffs intend to amend certain of their claims, and Defendants may move to dismiss some or all of the claims;

WHEREAS, Class Plaintiffs and Defendants previously raised a dispute in the April 3, 2018 Joint Case Management Conference Statement (ECF No. 292) concerning the scheduling of class certification depositions, the schedule for class certification briefing, and Class Plaintiffs' request to bifurcate class certification briefing;

WHEREAS, the Parties have met and conferred and resolved the dispute in an attempt to avoid any undue delay in these proceedings, such that, subject to Court approval, Class Plaintiffs will file their amended complaint and then move for class certification on all claims asserted in the amended complaint during the pendency of Defendants' anticipated motion to dismiss claims in the amended complaint; and

WHEREAS, the agreed-upon schedule sets forth a briefing schedule for Defendants' motion to dismiss Class Plaintiffs' amended complaint and a revised schedule for briefing class certification of all claims.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Parties, and subject to the approval of the Court:

The following deadlines are hereby established regarding the Class Plaintiffs' amended complaint and Defendants' anticipated motion to dismiss:

Date	Event
April 23, 2018	The Class Plaintiffs shall file the Second Amended Consolidated Consumer Class Action Complaint ("SAC").
May 23, 2018	Defendants shall answer, move to dismiss, or otherwise respond to the SAC.
June 22, 2018	Plaintiffs shall file any response in opposition to any motion to dismiss made by Defendants.
July 13, 2018	Defendants will file any reply(ies) in support of their motions to dismiss.

Class Plaintiffs shall move for class certification of all claims in the SAC, and the following deadlines are hereby revised in that regard:

Prior Deadline	New Deadline	Event
April 16, 2018	June 6, 2018	Class Plaintiffs shall file their motion for class certification of all claims in the SAC. All remaining class-certification depositions of Defendants will be completed sufficiently in advance of this deadline.
May 14, 2018	June 22, 2018	Defendants shall disclose experts on which they shall rely for their opposition to the class certification motion.
May 29, 2018	July 23, 2018	Defendants shall file their brief(s) in opposition to the Class Plaintiffs' motion for class certification. All remaining class-certification depositions of Class Representatives will be completed sufficiently in advance of this deadline.
June 25, 2018	August 20, 2018	Class Plaintiffs shall file a reply brief in support of their motion for class certification.

Sept. 17, 2018(2:15 p.m.)-Hearing on motion for class certification

**SO STIPULATED.**

Dated: April 7, 2018

Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Elizabeth J. Cabraser  
Elizabeth J. Cabraser

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*Plaintiffs' Lead Counsel and Chair of the Plaintiffs' Steering Committee*

1 Dated: April 7, 2018

SULLIVAN & CROMWELL LLP

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Sergio Marchionne, V.M. Motori, S.p.A., and V.M. North  
America, Inc.*

12 Dated: April 7, 2018

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IT IS SO ORDERED.

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**ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))**

In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from the signatories.

Dated: April 7, 2018

/s/ Elizabeth J. Cabraser  
Elizabeth J. Cabraser

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 7, 2018, a true and correct copy of the foregoing was electronically filed and served electronically via the Court's CM/ECF system, which will automatically serve notice to all registered counsel of record.

/s/ Elizabeth J. Cabraser  
Elizabeth J. Cabraser